

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

CHIN LEE a/k/a CHIN YOUNG YOUNG
a/k/a CHIN YOUNG LEE a/k/a LEE CHIN,

Case No.

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC.; TRANS UNION LLC a/k/a
TRANSUNION; BANK OF HOPE; AND
KEYBANK N.A.,

Defendants.

DEFENDANT EQUIFAX INFORMATION SERVICES, LLC'S NOTICE OF REMOVAL

Equifax Information Services, LLC (“Equifax”) files this Notice of Removal pursuant to 28 U.S.C. § 1446(a) and in support thereof would respectfully show the Court as follows:

A. PROCEDURAL BACKGROUND

1. On or about December 23, 2023, Plaintiff Chin Lee a/k/a Chin Young Young a/k/a Chin Young Lee a/k/a Lee Chin (“Plaintiff”) filed the Complaint in the Supreme Court of the State of New York, County of Queens, Index No. 727870/2024 (“State Court Action”) alleging violations of the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681, *et seq.*, against Defendants.

2. Equifax was served with Plaintiff’s Complaint on December 26, 2024. This Notice of Removal is being filed with the thirty (30) day time period required by 28 U.S.C. § 1446(b).

B. GROUND FOR REMOVAL

3. The present suit is an action over which the United States District Court, Eastern District of New York has original jurisdiction pursuant to 28 U.S.C. § 1331, as it is a civil action

founded on a claim or right arising under the laws of the United States, and may be removed to this Court by Defendant pursuant to the provisions of 28 U.S.C. § 1446(b). Removal is proper because Plaintiff's claims present a federal question. In the Complaint, Plaintiff seeks damages for Defendant's alleged violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.*

C. COMPLIANCE WITH PROCEDURAL REQUIREMENTS

4. Pursuant to 28 U.S.C. § 1441(a), venue of the removal action is proper in the United States District Court, Eastern District of New York because it is in the district and division embracing the place where the state court action is pending.

5. In accordance with 28 U.S.C. § 1446(a), a copy of all executed process, pleadings asserting causes of action, and orders in the State Court Action served upon Defendant Equifax are attached hereto as **Exhibit A**.

6. Defendants Experian Information Solutions, Inc., Trans Union LLC, Bank of Hope and KeyBank, N.A. have consented to the removal of this matter attached hereto as **Exhibit B**.¹

7. Promptly after the filing of this Notice of Removal, Equifax shall give written notice of the removal to the Plaintiff and will file a copy of this Notice of Removal with the Queens County Supreme Court, New York as required by 28 U.S.C. § 1446(d).

WHEREFORE, Equifax request that the above-described action be removed to this Court.

¹ Defendant Trans Union, LLC has resolved their claims with Plaintiff in principle but consent to the removal of this action.

This 27th day of January, 2025.

Respectfully submitted,

/s/ Forrest M. “Teo” Seger III
Forrest M. “Teo” Seger’ III

CLARK HILL PLC
1180 6TH Ave., 19th Floor, Suite 1910
New York, NY 10036

2301 Broadway St.
San Antonio, Texas 78215
Phone: (210) 250-6000
Fax: (210) 250-6100
Email: tseger@clarkhill.com

**ATTORNEY FOR DEFENDANT
EQUIFAX INFORMATION SERVICES
LLC**

CERTIFICATE OF SERVICE

This is to certify that on January 27, 2025, a true and correct copy of the foregoing document has been filed with the Clerk of the Court which will send a notification to all counsel of record via U.S. Mail:

Serge F. Petroff
Petroff Amshen LLP
1795 Coney Island Ave, Third Floor
Brooklyn, NY 11230
spetroff@petroffamshen.com
Counsel for Plaintiff

/s/Forrest M. “Teo” Seger III
Forrest M. “Teo” Seger III
Attorney for Defendant
Equifax Information Services LLC